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IDAHO PUBLIC UTILITIES COMMISSION

Benjamin J. Otto (ISB No. 8292) 710 N 6<sup>th</sup> Street Boise, ID 83701 Ph: (208) 345-6933 x 12

Fax: (208) 344-0344

botto@idahoconservation.org

Attorney for the Idaho Conservation League

## BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

| IN THE MATTER OF IDAHO POWER  | ) |                           |
|-------------------------------|---|---------------------------|
| COMPANY'S PETITION TO         | ) | CASE NO. IPC-E-14-09      |
| TEMPORARILY SUSPEND ITS PURPA | ) |                           |
| OBLIGATION TO PURCHASE        | ) | IDAHO CONSERVATION LEAGUE |
| ENERGY GENERATED BY SOALR-    | ) |                           |
| POWERED QUALIFYING FACILITIES | ) | PETITION TO INTERVENE     |
| ("OF").                       | ) |                           |

COMES NOW the Idaho Conservation League ("ICL") and hereby requests leave to intervene in the above captioned matter pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.071-073. As discussed below, ICL has direct and substantial interests in these proceedings, and therefore should be granted intervention.

## 1. The name of this intervenor is:

Benjamin J. Otto Idaho Conservation League 710 N. 6<sup>th</sup> st. Boise, Idaho 83702 Ph: (208) 345-6933 x 12 Fax: (208) 344-0344

botto@idahoconservation.org

Please provide copies of all pleadings, production requests, production responses, Commission orders, and other documents to the name and address above. In the interest of conserving natural resources and reducing the costs to all parties, please provide hard copies of pleadings, testimony, and briefs only. Production requests, responses, notices, Commission orders, and other filings may be submitted via electronic mail in accordance with IPUC Rules 31.01.01.063.02-03.

2. Idaho Conservation League claims a direct and substantial interest in this proceeding arising from the impact to our members served by Idaho Power and to ICL's long-term role advocating for public values. As Idaho's largest state-based conservation organization, we have approximately 20,000 members who are residential customers of Idaho Power. Our supporters have a strong interest in ensuring a predictable, stable regulatory system to grow Idaho's clean energy resources in order to protect Idaho's air and climate. ICL brings a unique and valuable perspective to this proceeding because our supporters are also Idaho Power customers who support using their ratepayer dollars to support clean energy projects. By focusing on the obligation to negotiate PURPA contracts, and resolving the accurate integration costs to include in these contracts, ICL's intervention will not unduly broaden the issues in this proceeding.

3. ICL intends to fully participate in this matter as a party. The nature and quality of ICL's intervention in the proceeding is dependant upon the nature and effect of other evidence in this proceeding. If necessary ICL may introduce evidence, be heard in argument, and call, examine, and cross-examine witnesses. ICL intends to seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

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DATED this 21st day of May 2014.

Respectfully submitted,

Benjamin J. Otto

Idaho Conservation League

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 21st day of May, 2014, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

## Hand delivery:

Jean Jewell Commission Secretary (Original and seven copies provided) Idaho Public Utilities Commission 427 W. Washington St. Boise, ID 83702-5983

Electronic Mail:
Donovan Walker
Idaho Power Company
121 West Idaho St
P.O. Box 70
Boise, Idaho 83707

dwalker@idahopower.com

Benjamin J. Otto